

1 ROBERT W. FREEMAN  
Nevada Bar No. 3062  
2 [Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)  
FRANK A. TODDRE, II  
3 Nevada Bar No. 11474  
[Frank.Toddre@lewisbrisbois.com](mailto:Frank.Toddre@lewisbrisbois.com)  
4 E. MATTHEW FREEMAN  
Nevada Bar No. 14198  
5 [Matt.Freeman@lewisbrisbois.com](mailto:Matt.Freeman@lewisbrisbois.com)  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
6 6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
7 702.893.3383  
FAX: 702.893.3789  
8 *Attorneys for Defendants*  
*Dr. Jennifer Corneal and County of Clark*  
9

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 \*\*\*

13 KRISTINA KERLUS, individually,  
14 Plaintiffs,  
15 vs.

16 DR. JENNIFER CORNEAL, in her individual  
capacity; A. SANTOS, in her individual  
17 capacity; CITY OF LAS VEGAS, a Municipal  
corporation; and COUNTY OF CLARK, a  
18 Municipal corporation; LAS VEGAS  
METROPOLITAN POLICE DEPARTMENT,  
19 jointly and severally,  
20 Defendants.

CASE NO. 2:24-cv-02352-APG-DJA  
**JOINT MOTION**  
~~STIPULATION AND ORDER~~  
**EXTENDING DEADLINE FOR THE**  
**FILING OF DEFENDANTS DR.**  
**JENNIFER CORNEAL AND COUNTY OF**  
**CLARK'S RESPONSE TO PLAINTIFF'S**  
**FIRST AMENDED COMPLAINT**

22 IT IS HEREBY STIPULATED AND AGREED, by and between Defendants, Dr. Jennifer  
23 Corneal and County of Clark ("Defendants"), by and through their attorney of record, Robert W.  
24 Freeman, Esq., of Lewis Brisbois Bisgaard & Smith LLP, and Plaintiff Kristina Kerlus, by and  
25 through her counsel of record, Paul S. Padda, of Paul Padda Law, PLLC, that:

26 The due date for the Defendants' Response to Plaintiff's First Amended Complaint (ECF  
27 No. 7), be extended Thirty (30) days, from April 28, 2025, to May 28, 2025.

**Reason for the Extension:**

Because of the complexity of the claims made in Plaintiff's Complaint, Defendants need additional time to perform an investigation prior to filing their initial responsive pleading. This includes meeting with clients, percipient witnesses and ensuring the compilation of the prior file and analyzing the same. This is Defendants' first request to extend this deadline, which is made in good faith and not for purposes of delay. Plaintiff Counsel has graciously agreed to the instant extension of time.

DATED this 22<sup>nd</sup> day of April, 2025.DATED this 22<sup>nd</sup> day of April, 2025.**PAUL PADDA LAW, PLLC****LEWIS BRISBOIS BISGAARD & SMITH LLP**By: /s/ Paul S. PaddaBy: /s/ Robert W. Freeman

PAUL S. PADDA

ROBERT W. FREEMAN

Nevada Bar #10417

Nevada Bar No. 3062

4560 South Decatur Blvd., Suite 300

FRANK A. TODDRE, II

Las Vegas, Nevada 89103

Nevada Bar No. 11474

ANTONIO M. ROMANUCCI

E. MATTHEW FREEMAN

(Admitted PHV)

Nevada Bar No. 14198

PATRICK DRISCOLL

6385 S. Rainbow Blvd, Suite 600

(Admitted PHV)

Las Vegas, Nevada 89118

**ROMANUCCI & BLANDIN, LLC***Attorneys for Dr. Jennifer Corneal and  
County of Clark*

321 North Clark Street, Suite 900

Chicago, Illinois 60654

*Attorneys for Plaintiff**Kristina Kerlus*

Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as a joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS the joint motion (ECF No. 34).

IT IS SO ORDERED:


  
 DANIEL J. ALBRECHTS  
 UNITED STATES MAGISTRATE JUDGE
DATED: 4/23/2025